EXHIBIT B

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9   UNITED STATES DISTRICT COURT

10   NORTHERN DISTRICT OF CALIFORNIA

11   SAN FRANCISCO

12   ANIBAL RODRIGUEZ, *et al.* individually and   Case No. 3:20-CV-04688
     on behalf of all other similarly situated,
13   **[PROPOSED] ORDER RE: PLAINTIFFS'**
                            Plaintiffs,   **REQUEST FOR GOOGLE TO EMPLOY**
14   **ADDITIONAL SEARCH TERMS**
           vs
15   Judge: Hon. Alex G. Tse
     GOOGLE LLC, *et al*.   Courtroom: A, 15th Floor
16   Action Filed: July 14, 2020
                            Defendant.   Trial Date: Not Set
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[PROPOSED] ORDER

2   Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request for Google

3   to employ additional search terms for the first 5 of 24 custodians ("Search Term Letter Brief").

4   Having considered the Search Term Letter Brief, the Court orders that Google should

5   search the below terms as indicated with an "X" in the column labeled "Google to Search":

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No.	Search Terms	Google to Search:
1	"sWAA" OR WAA* (Monsees)[1]	
2	"Web/App" (Monsees)	X
3	"W&A" OR "W&AA" OR "W&AAs"	X
4	"web history" (Monsees)	X
5	Web /2 "app activity" (Monsees)	X
6	"app activity" (Monsees)	
7	SMH or "my history" or Myhistory	
8	UDC or "User Data Controls"	
9a	"activity controls" (Ganem, Ma, Hansen, Weng)	X
9b	"activity controls" (Monsees)	
10a	(user OR users OR consumer OR consumers OR people) /5 (confus* OR mislead*)	X
10b	user* or consumer* or customer* or people*) /10 (confus* or underst* OR misunderst* OR comprehen* OR misle* OR consent OR know OR represent* OR disclos*	
11	"new ad control" OR "new ads control" OR "new ads controls" OR "new ad controlling" OR "new ads controlling" OR "new ad controls" OR "new ad controlled" OR "new ads controlled" OR NAC	X
12	(apps /4 "use Google services")	X
13	"help center"	
14a	"Privacy Policy" (Weng)	X
14b	"Privacy Policy" (Monsees, Ganem, Ma, Hansen)	

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[1] Wherever a custodian's name is identified in (parentheses) at the end of a proposed search term string, the term should be employed for that custodian.

[PROPOSED] ORDER RE: PLAINTIFFS' REQUEST FOR GOOGLE TO EMPLOY ADDITIONAL SEARCH
TERMS
Case No. 3:20-CV-04688

No.	Search Terms	Google to Search:
15a	CFS or "Consent Flow Service" (Weng)	X
15b	CFS or "Consent Flow Service" (Monsees, Ganem, Ma, Hansen)	
16	"consent bump"	
17	N^{xxx}[2] or N^{xxx} or N^{xxx}	
18a	"on or off" OR "switch the collection" (Weng)	X
18b	"on or off" OR "switch the collection" (Monsees, Ganem, Ma, Hansen)	
19	("on or off" OR "switch the collection") AND (WAA" or "WAAH" or "WAAs" or "sWAA" or "W&AA" or "W&AAs" or "web history" or "WHSH" or (Web pre/2 "App Activity")) AND NOT ("Location History") (Ganem, Ma, Monsees, Hansen)	X
20a	(associat* /15 (user OR account OR profile)) AND ("GA4F" or "GA for Firebase" or "Google Analytics" or scion)	X
20b	associat* /15 (user OR account OR profile)	
21a	"activity data" (Hansen, Weng)	X
21b	"activity data" (Monsees, Ma, Ganem)	
22a	"app data" (Weng)	X
22b	"app data" (Monsees, Ma, Ganem, Hansen)	
23a	PII (Weng)	X
23b	PII (Monsees, Ma, Ganem, Hansen)	
24	personal* /5 info*	
25	Zwieback OR Biscotti	
26	K^{xxx}	
27	GAIA	
28	T^{xxx}	
29	Footprint*	
30	BigQuery	

[2] This term is an internal Google code name the Court has previously sealed and is therefore abbreviated to protect Google's confidential information. *See* ECF No. 186. "K^{xxx}" at row 26, and "T^{xxx}" at row 28, are also internal code names.

[PROPOSED] ORDER RE: PLAINTIFFS' REQUEST FOR GOOGLE TO EMPLOY ADDITIONAL SEARCH TERMS
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No.	Search Terms	Google to Search:
31	Sawmill	
32	Firelog or Firedata or Firestore	
33	Plog OR "personal log" or GWS	
34	UUAD OR "Unified user App Data"	
35	IDFA or ADID	
36	(Id OR Ids) /5 (app OR apps OR ad OR ads OR advertising OR advertisement OR device OR instance OR user OR android OR ios)	
37a	AdMob /15 (Gold OR GA4F OR WAA or WAAH or WAAs or sWAA or "W&AA" or "W&AAs" OR "my activity" OR "Google mobile service" OR GMS) (Ganem, Monsees, Ma, Hansen)	X
37b	AdMob AND (Gold OR analytics OR GA4F OR scion OR firebase OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR *WAA* OR "my account" or "my activity" OR perform* OR conversion* OR event OR audience OR FCM OR "cloud messaging" OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP) (Ganem, Monsees, Ma, Hansen)	
38a	AdMob /15 Gold (Weng)	X
38b	AdMob and Gold (Weng)	
39a	AdMob /15 (firebase OR ((app or apps or application or applications) /5 (event OR activity OR measure*)) OR appmeasurement OR "Google mobile service" OR GMS) (Weng)	X
39b	AdMob /50 (firebase OR scion (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR perform* OR conversion* OR event OR audience OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP) (Weng)	
40a	(FCM or "cloud messaging") /15 (Gold OR analytics OR GA4F OR "Google mobile service" OR GMS) (Ma/Hansen)	X
40b	(FCM or "cloud messaging") AND (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR *WAA* OR "my account" or "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP) (Ma)	
40c	(FCM or "cloud messaging") /10 (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR "my account" or "my activity" OR perform* OR conversion* OR event OR audience OR AdMob OR "Google mobile service" OR GMS OR Clearcut OR "Google Mobile Platform" OR GMP) (Hansen)	

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[PROPOSED] ORDER RE: PLAINTIFFS' REQUEST FOR GOOGLE TO EMPLOY ADDITIONAL SEARCH TERMS
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No.	Search Terms	Google to Search:
41	("real time" /20 bid*) OR RTB	X
42	"App Indexing" /50 ("my account" OR "my activity" OR ("WAA*" OR "sWAA"))	X
43a	("Google Mobile Service" OR GMS) /25 (Gold OR analytics OR GA4F OR firebase) AND (log* OR user /2 data OR measurement)	X
43b	(Analytics OR firebase OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) AND (Gold OR app! /5 (event OR interact! OR activity OR measure!)) OR !WAA! OR "my account" OR "my activity" OR perform! OR conversion! OR event OR audience OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement OR "Google mobile service" OR GMS OR Clearcut) (Ganem)	
43c	("Google Mobile Service" OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR "Google Mobile Platform" OR GMP OR (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement OR !WAA! OR "my account" or "my activity" OR perform! OR conversion! OR event OR audience OR FCM OR "cloud messaging" or AdMob OR Clearcut) (Ma/Monsees/Hansen/Weng)	

IT IS SO ORDERED.

DATED: _____   _____

Honorable Alex G. Tse
United States Magistrate Judge

[PROPOSED] ORDER RE: PLAINTIFFS' REQUEST FOR GOOGLE TO EMPLOY ADDITIONAL SEARCH TERMS
Case No. 3:20-CV-04688